

Draft section for Action Items Memo (David; 8/22)

The following discussion occurred in the context of presenting an approach to assessing private Forest Roads.

Several members expressed the opinion that an “accounting” of “natural sources” of sediment (i.e., a “sediment budget”) should be an important aspect of distinguishing whether road sediment is significant, relative to other sources, including: stream bank erosion, land surface erosion from land management practices, _____. Several theoretical scenarios were suggested, including a scenario where roads represent 1% of the total sediment load in any given watershed.

DEQ explained to the TWG members that it has identified an approach using a phased source assessment in previous meetings and shown in supporting materials. DEQ indicated that the current phase (Phase I) is based on an evaluation of existing information sources including literature, ODF publications and local knowledge, and acknowledged that extensive field data collection are not possible in the timeframe contemplated to complete the MidCoast TMDLs. DEQ explained that Phase I assessment is the identification **and protocol** of potential sources, including high risk road sediment sources along with gaps in current regulatory framework. DEQ staff stated that sufficient information exists to demonstrate that un-surfaced roads (regardless of sector) generate and deliver sediment to streams. Since the primary goal of the MidCoast sediment TMDLs is to reduce the anthropogenic load from sources of sediment to streams, the relative contribution of roads to overall sediment processes is largely unrelated to identification of natural sources.

DEQ (Josh) that roads deliver sediment on different spatial & temporal patterns than natural sources; that is part of the difficulty associated with choosing source inventory approaches and timeframes (any additional points in this part of the discussion?) _____

The potential methodology(s), timeframe and costs to perform a detailed analysis of natural sources in the sedimentation listed waterbodies were not explored further by the group. DEQ indicated that more detailed source assessment information will be conducted in Phase II of the sediment approach (during implementation) and is intended to gather the more detailed information needed to prioritize management measures and conduct on-the-ground activities.

Points to emphasize for follow-up:

There is no “natural” or background level of road sediment generation and delivery; it is entirely a man-made phenomenon (possible minor exceptions: game trails, native American travel routes, etc.)

Roads are already subject to several regulatory frameworks, depending on sector: Agricultural, Private and state Forestry, Federal Forests, County, Urban, private.

Performance standards and targets are already established under several of these regulatory programs: AgWQMgt, FPA; State (MS4 permit);

Sector	Performance std	Reference
Agriculture	agricultural activities will not cause the following visual indicators of erosion where erosion may cause sediment runoff into waters of the state: (SEE RULE)	OAR 603-095-2240 Prevention and Control Measures: (5) Erosion and Sediment Control
Forestry (state & private); FPA	Minimize sediment delivery; < 10% increase in turbidity (NTU) from upstream reference	road OARs (OAR 629-625, 629-630, and 629-660)
State Highways		MS4 statewide permit
County		
Municipal		
Other	Generally, State (DEQ) turbidity std is applied;	Generally, complaint based; NPDES: GEN 1200-C permit may apply

Action/follow-up Items:

DEQ Needs to: Review and Examine sediment approach(es) matrix with TWG

- Clarify policy (minimize anthropogenic sediment contribution)
- Clarify goal: Minimize Anthropogenic contribution
- Targets: develop in-stream targets (biological criteria, turbidity, etc)
- Clarify Two-phase approach
- Phase I: Identify human sources, identify gaps in current regulatory framework; for each major source category, including Roads
- Phase II:
 - gather data to characterize Landslides
 - channel bank condition
 - Land/surface run-off
 - Other (hydromodification)

Write-up memo to LSAC/TWG clarifying the above bullets